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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN JOSE DIVISION

13 FACEBOOK, INC., and MARK ZUCKERBERG,

14 Plaintiffs,

15 v.

16 CONNECTU LLC, (now known as CONNECTU,
17 INC.), CAMERON WINKLEVOSS, TYLER
18 WINKLEVOSS, DIVYA NARENDRA,
19 PACIFIC NORTHWEST SOFTWARE, INC.,
20 WINSTON WILLIAMS, WAYNE CHANG,
21 DAVID GUCWA, and DOES 1-25,

22 Defendants.
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CASE NO. C 07-01389 RS

**DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
EXHIBITS A, B, AND D TO THE
DECLARATION OF SCOTT R.
MOSKO IN SUPPORT OF
DEFENDANTS' REPLY**

[PROPOSED] ORDER

Date: July 11, 2007

Time: 9:30 a.m.

Dept.: 4

Judge: Hon. Richard Seeborg

1 **ADMINISTRATIVE MOTION FOR FILING UNDER SEAL**

2 **1. Papers Submitted For Filing Under Seal in Their Entireties**

3 Pursuant to Civil Local Rules 7-11 and 79-5(b), Defendants respectfully hereby request leave
4 of Court to file under seal in their entireties the following documents being lodged with the Clerk:

- 5 ▪ **EXHIBITS A, B, AND D TO THE DECLARATION OF SCOTT R. MOSKO IN**
6 **SUPPORT OF DEFENDANTS' REPLY (FILED UNDER SEAL IN THEIR**
7 **ENTIRETIES)**

8 Exhibit A includes deposition testimony in a deposition marked "Highly Confidential" or
9 "Confidential" under the protective order.

10 Exhibit B is a publicly filed document that Plaintiffs marked as confidential. Defendants
11 requested that Plaintiffs allow this document to be publicly filed. Plaintiffs refused.

12 Exhibit D is supplemental responses to discovery that Plaintiffs have designated highly
13 confidential.

14 As required by Civil Local Rule 79-5(b), Defendants are lodging with the Clerk copies of the
15 documents which have been designated "Highly Confidential" and "Confidential" (for filing under
16 seal).

17 **SUPPORTING DECLARATION OF SCOTT R. MOSKO**

18 I, Scott R. Mosko, declare as follows:

19 1. I am an attorney admitted to practice in the State of California and the United States
20 District Court for the Northern District of California, and a partner of Finnegan, Henderson, Farabow,
21 Garrett & Dunner, L.L.P., attorneys of record for Defendants Pacific Northwest Software and Winston
22 Williams. The matters referred to in this declaration are based on my personal knowledge and if
23 called as a witness I could, and would, testify competently to those matters.

24 2. The representations made above in this Administrative Motion are true and correct to
25 the best of my knowledge and belief.

26 I declare under penalty of perjury under the laws of the United States of America that the
27 foregoing is true and correct and that this declaration was executed this 6th day of July, 2007, at Palo
28 Alto, California.

By: _____ /s/

Scott R. Mosko

DEFENDANTS' ADMINISTRATIVE MOTION AND [PROPOSED]

1 **[PROPOSED] ORDER**

2 Upon good cause shown, **IT IS HEREBY ORDERED** that the following documents shall be
3 received and filed under seal in their entireties by the Clerk:

4 Exhibits A, B, and D to the Declaration of Scott R. Mosko in Support of Defendants Pacific
5 Northwest Software, Inc.'s and Winston Williams's Reply to Plaintiffs' Opposition to
6 Defendants' Opposition to Dismiss for Lack of Personal Jurisdiction.

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9 Dated: _____, 2007

10 United States Magistrate Judge